General Comments on Proposed WH General Schedule

1. The effectiveness of a general type schedule is geared to the ease with which records can be properly identified in organizational units and related to the functions covered by the schedule. Do the 3 functional areas of the schedule accomplish this objective? Would the records be readily identified by those who must use the schedule?

2. A general schedule should cover all records of an organization. A survey of WH Support records two years ago listed 38 separate file series as compared with 5 in this schedule. Are files of the Division Chief covered? What part of the schedule would apply to WH Registry?

3. Screening records is time consuming and expensive and impedes orderly and timely destruction or retirement of files. Disposition instructions for 50% of the items in this schedule require screening. This can be avoided by filing together records having similar retention periods, breaking the file at stated intervals of time and bringing forward items from the older files as needed.

4. Disposition instrctuions should be stated clearly in terms of a specific action that can be readily applied by the file custodian. Such terms as "screen" "retain as needed" "maintain only as needed" are not action instructions. The most effective terms in any schedule are "destroy" and "retire".

Specific Comments on Proposed WH General Schedule

Area Branches:

Item 9 c.     What are the disposition instructions?
Item 9 e.     Is OCR office of record?
Item 9 h.     Why does this confusion about "FBI property" persist? FBI interposes no objection to destruction of these reports.

Item 10.     Instructions not clear. "Maintain and retain" how long? "Retain only as necessary and destroy excess" does not identify records to be retained or those to be destroyed.

Item 11 d.     This is no disposition instruction

Item 12 b.     Isn't RID the office of record for crypto-pseudo? Must WH Registry retain them permanently.

## Area Branches (continued)

Item 17.    What is the relationship of these records to those described
            in Administrative and Support Files schedule.

Item 17 d.  What are "Support Files" in this instance -- are'nt a, b and c
            support files also.  How can a files custodian or anyone else
            identify such records?  "Destroy after answering"--answering
            what?

## Management and Operational Staffs

        Are these organizational units identifiable in terms of functions
and responsibilities?

Item 3.     The general instructions concerning annual file break should
            be deleted and incorporated in instructions for 3b which is
            the only place it could apply.

Item 3 f.   When will these be destroyed?  Can't retention periods in item 5 for
            logs be applied here?  Why not move this item over to 5?

## Administrative and Support Files

Item 3.     "Screen annually"--for what and why?  This is a meaningless
            instruction.

Item 4 a, b, c, d, e.  Screen for waht?  "Retain as necessary" is not a
            disposition instruction.  There are in existence authorized
            disposition instructions for logistics records - why not use them.

Item 5.     Transfer file where?  What is final disposition of folder?
            What happens if employee separates?  Are contract employee
            folders included?